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The Honorable Andrew L. Carter, Jr.  
United States District Court  
Southern District of New York  
40 Foley Square, Courtroom 1306  
New York, New York 10007

**By ECF and Email**

November 9, 2015

Re: In re Lehman Bros. Holdings Inc., 15-cv-08052 (ALC)

Dear Judge Carter:

We represent Shield Securities Ltd. (*Shield*), in the above captioned action. Following up on a phone message left with Chambers this morning, we write to inform you that the parties have reached a settlement in principle. The parties jointly request that Shield be granted an extension to file its Reply in further support of its Motion for Leave to Appeal until Tuesday, November 24, 2015, so that the parties can complete the necessary paperwork to finalize the settlement and dismissal of this appeal and the underlying action in the Bankruptcy Court.

Shield's Reply was originally due on November 5, 2015. This is the second request for an extension of time with respect to this motion, and it is made jointly with LBSF. Accordingly, we respectfully request that the Court so-order the stipulation annexed hereto as Exhibit A which provides that Shield will file its Reply on November 24, 2015.

Respectfully submitted,



David Livshiz

cc: Paul DeFilippo, Esq. (by email)  
William F. Dahill, Esq. (by email)  
Joanna Schorr, Esq. (by email)

# **EXHIBIT A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

	X	
In re:	:	Chapter 11
	:	
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	:	Case No. 08-13555 (SCC)
	:	
Debtors.	:	
	X	
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	
	:	
Plaintiff,	:	
	:	
-against-	:	Adversary Proceeding
	:	No. 10-03547 (SCC)
BANK OF AMERICA NATIONAL ASSOCIATION,	:	
<i>et al.</i> ,	:	
Defendants.	:	
	X	
SHIELD SECURITIES LIMITED,	:	15-cv-08052 (ALC)
	:	
Appellant,	:	On Appeal from the United
	:	States Bankruptcy Court
-against-	:	for the Southern District of
	:	New York, Honorable
LEHMAN BROTHERS SPECIAL FINANCING INC.,	:	Shelley C. Chapman,
	:	Adv. Pro. No. 10-03547
Appellee.	:	
	X	

**STIPULATION**

WHEREAS, the Bankruptcy Court entered the Order Concerning Shield Securities Limited (“Shield”)’s Motion to Dismiss for Lack of Personal Jurisdiction (the “Order”) (ECF No. 1148) on September 28, 2015;

WHEREAS, on October 5, 2015 Shield filed a Notice of Appeal (ECF No. 1);

WHEREAS, accompanying the Notice of Appeal, Shield moved for leave to appeal the Order (the “Motion”) (ECF No. 4), accompanied by the Memorandum of Law in Support of

Shield's Motion (ECF No. 6) and the Declaration of Shannon M. Leitner (ECF No. 5);

WHEREAS, on October 15, 2015, Lehman Brothers Special Financing Inc. ("LBSF") filed an unopposed letter motion extending the time for LBSF to file its Opposition to October 26, 2015 and Shield's time to file its Reply to November 5, 2015, which the Court so ordered on October 16, 2015 (ECF No. 8);

WHEREAS, on October 26, 2015, LBSF filed its Opposition to Shield's Motion for Leave to Appeal (ECF No. 10), along with the Declaration of William F. Dahill (ECF No. 11);

WHEREAS, on November 9, 2015, the parties reached a settlement in principle;

IT IS HEREBY STIPULATED AND AGREED, by and between LBSF and Shield, by their respective undersigned counsel, as follows:

1. The deadline for Shield to file its Reply to LBSF's Opposition is hereby extended to November 24, 2015.

2. Shield reserves all rights and defenses it may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction (including, for the avoidance of doubt, objections to the exercise of in personam jurisdiction over Shield and the exercise of in rem jurisdiction over the subject matter of this dispute).

Dated: November 9, 2015  
New York, New York

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*Attorneys for Appellant Shield Securities  
Limited*

**IT IS SO-ORDERED:**

November \_\_, 2015  
New York, New York

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*Attorneys for Appellee Lehman Brothers  
Special Financing Inc.*

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HONORABLE ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE